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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

VINCENT MASSA and KATHRYN
MASSA, individually, as natural parents, and
personal representatives of the Estate of
DOMINIC MASSA, decedent, by and for the
benefit of his heirs;

Plaintiffs,

vs.

UNITED STATES OF AMERICA; and IHC
HEALTH SERVICES, INC. dba CEDAR
CITY INSTACARE,

Defendants.

**STIPULATION TO AMEND
COMPLAINT**

Case No. 2:21-cv-00187-JCB

Magistrate Judge Jared C. Bennett

Plaintiffs, VINCENT MASSA and KATHRYN MASSA, individually, as natural parents, and personal representatives of the Estate of DOMINIC MASSA, decedent, by and for the benefit of his heirs; Defendant United States of America; and Defendant IHC Health Services, Inc. dba Cedar City InstaCare, by and through their respective counsels of record, hereby stipulate and agree to the filing of an Amended Complaint.

RESPECTFULLY SUBMITTED this 29th day of July, 2021.

G. ERIC NIELSON & ASSOCIATES

/S/ Todd Wahlquist

G. Eric Nielson
Todd Wahlquist
Attorneys for Plaintiff

**U.S. DEPARTMENT OF JUSTICE
DISTRICT OF UTAH**

/S/ Amanda A. Berndt (with permission given via
email on 7/29/2021)

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Andrea T. Martinez
Jeffrey E. Nelson
Attorneys for the United States of America

**BURBIDGE, VAN KOMEN, TANNER &
SCRUGGS**

/S/ Nathan W. Burbidge (with permission given via
email on 7/29/2021)

Nathan W. Burbidge
Elliot B. Scruggs
*Attorneys for IHC Health Services, Inc. dba Cedar
City InstaCare*

PROOF OF SERVICE

I, certify, that on the 29th day of July 2021, the following individuals were served with a true and correct copy of the foregoing via the Court's e-filing system and email as follows:

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